

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ESSAR STEEL ALGOMA INC., *et al.*,

Plaintiffs,

-against-

SOUTHERN COAL SALES CORPORATION,

Defendant.

Case No. 1:17-mc-00360-AT

**NOTICE OF PLAINTIFF ALGOMA STEEL INC.'S  
MOTION TO ENFORCE SETTLEMENT AGREEMENT**

PLEASE TAKE NOTICE that upon the accompanying Declarations of Ron Spina and Michael Moraca, Memorandum of Law, and all pleadings and proceedings previously held herein, Plaintiff Essar Steel Algoma Inc. n/k/a Algoma Steel Inc. (“Algoma”) will move this Court at a date and time convenient to the Court for an order enforcing the Settlement Agreement and Mutual Release between Algoma and Defendants that was “so ordered” by this Court (Dkt. 186), for damages, interest, and attorneys’ fees thereunder, and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

**THOMPSON HINE LLP**

Dated: August 29, 2022

By: /s/ Mark R. Butscha, Jr.

Kip T. Bollin (*admitted pro hac vice*)

Mark R. Butscha, Jr.

3900 Key Center

127 Public Square

Cleveland, OH 44114

Tel: (216) 566-5500  
Fax: (216) 566-5800  
Email: [kip.bollin@thompsonhine.com](mailto:kip.bollin@thompsonhine.com)  
Email: [mark.butscha@thompsonhine.com](mailto:mark.butscha@thompsonhine.com)

-and-

Emily J. Mathieu  
335 Madison Ave., 12th Floor  
New York, NY 10017-4611  
Tel: (212) 344-5680  
Fax: (212) 344-6101  
Email: [emily.mathieu@thompsonhine.com](mailto:emily.mathieu@thompsonhine.com)

*Attorneys for Plaintiff Essar Steel Algoma Inc.  
n/k/a Algoma Steel Inc.*